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Comment 25 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.

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Subject: B001901
Comment:
re: B001901 Open Sky Ranch, Riverdale

There are two major problems with this proposal or application and analysis.

First, this proposed project by Open Sky Ranch Dairy has no net benefits for the local low-income community nearby in Riverdale and in the surrounding area of Fresno County. The San Joaquin Valley, including Fresno County, is not in compliance with several of the federal health standards set under the authority of the Clean Air Act. Ozone and PM2.5 are two categories of air pollution where compliance is severely lacking. We should not have to detail in these comments the health effects of local air pollution but premature death is the most obvious consequence.

This proposal will produce methane in a manure digester and burn it nearby for the purpose of generating electricity even though there is plenty of electricity already in the local grid to supply the needs of the dairy which is produced more cleanly. The result of this digester and electrical generation through combustion will impact local air quality through the creation of NOx. NOx is key to ozone formation in the warm months of the SJV and is key to a majority of PM2.5 formation in the cooler months. The need to reduce NOx emissions in the San Joaquin Valley is the key to the valley reaching compliance with the federal clean air standards.

This project, because it will make local air quality worse, is in conflict with the language of AB32 which, in summary, says that

efforts to reduce GHG emissions should not compromise or conflict with efforts to reduce air pollution in nonattainment areas.

Second, the Low Carbon Fuel Standard requires that each fuel pathway receive a life-cycle assessment of all related GHG emissions, both direct and indirect. It seems that this has not been done for the analysis of carbon intensity of the electricity to be produced by this project. It may be that the guidance from CARB for this type of project is incorrect as well.

The manure must be produced in order for this project to both produce and collect methane for the purpose of combustion in an electrical generator. No analysis has been done regarding the GHG emissions involved in the production of this manure. The GHG emissions of the dairy regarding the milk produced are not regulated. Therefore, these emissions must be applied to the manure and to the methane created from that manure. This methane is created on purpose, not by chance, through the liquefaction of the manure. The business of producing and collecting this methane is for the intent of making a profit. This should be obvious.

In conclusion, this project should be denied because it will harm local air quality. If the harm to local air quality is mitigated, then before approval, a complete life-cycle assessment of how the methane is created, including everything associated with the cows creating the manure, must be completed.

Tom Frantz
President, Association of Irrigated Residents

Attachment:

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